

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CAREY MARTIN,)	
)	
Plaintiff,)	
)	Case No. 10 C 2611
v.)	
)	Judge Wayne R. Andersen
MIDLAND CREDIT MANAGEMENT, INC.,)	
)	Magistrate Judge Maria Valdez
Defendants.)	
)	

UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

NOW COMES Defendant Midland Credit Management, Inc. ("MCM"), and for its motion for extension of time to respond to the complaint, states as follows:

1. MCM's registered agent was served with the Complaint on June 17, 2010.
2. MCM has recently retained counsel for this matter and requests an extension of time to respond to the complaint, in order to review the materials so that it may file an appropriate responsive pleading to the Complaint.
3. Therefore, MCM requests an extension of thirty days, up to and including August 9, 2010, to file its responsive pleading to the Complaint.
4. The undersigned counsel has consulted with counsel for Plaintiff, and Plaintiff has no objection to MCM's request for a thirty-day extension.

WHEREFORE, MCM respectfully requests that this Honorable Court grant an extension of time, up to and including August 9, 2010, for MCM to file its responsive pleading.

Dated: July 8, 2010

Respectfully Submitted,

MIDLAND CREDIT MANAGEMENT,
INC., MIDLAND FUNDING, LLC, and
ENCORE CAPITAL GROUP, INC.

By: /s/ Tammy L. Adkins
One of Their Attorneys

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2010, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which constitutes service on below counsel, registered electronic filing users, pursuant to Fed. R. Civ. P. 5(b)(2)(D) and L.R. 5.9:

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